

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EDMAR FINANCIAL COMPANY, LLC;
IRISH BLUE & GOLD, INC.; and XTX
MARKETS LIMITED,

Plaintiffs,

vs.

CURRENEX, INC.; GOLDMAN SACHS &
CO. LLC; HC TECHNOLOGIES, LLC;
STATE STREET BANK AND TRUST
COMPANY; STATE STREET GLOBAL
MARKETS INTERNATIONAL LIMITED;
and JOHN DOE DEFENDANTS 1-5,

Defendants.

Case No. 21-cv-06598

**DECLARATION OF DANIEL L.
BROCKETT IN SUPPORT OF
PLAINTIFFS' MOTION FOR LEAVE TO
FILE THIRD CONSOLIDATED
AMENDED CLASS ACTION
COMPLAINT**

I, DANIEL L. BROCKETT, submit this declaration pursuant to 28 U.S.C. § 1746, and declare under penalty of perjury as follows:

1. I am one of the Counsel for Plaintiffs in the above-captioned action. I make this declaration in support of Plaintiffs' motion for leave to file the proposed Third Consolidated Amended Class Action Complaint ("TAC").
2. Attached hereto as Exhibit 1 is a true and correct copy of the proposed TAC.
3. Attached hereto as Exhibit 2 is a true and correct "redline" document, which identifies all changes in the proposed TAC as compared to the Second Amended Class Action Complaint (Dkt. No. 96).

I certify under the penalty of perjury the forgoing statements are true and correct.

Executed in New York, New York on this 16th day of May 2025.

/s/ Daniel L. Brockett
Daniel L. Brockett